

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR IMMIGRANT  
RIGHTS; LEAGUE OF WOMEN VOTERS  
OF VIRGINIA; LEAGUE OF WOMEN  
VOTERS OF VIRGINIA EDUCATION  
FUND; AFRICAN COMMUNITIES  
TOGETHER,

*Plaintiffs,*

v.

SUSAN BEALS, in her official capacity as  
Virginia Commissioner of Elections; JOHN  
O'BANNON, in his official capacity as  
Chairman of the State Board of Elections;  
ROSALYN R. DANCE, in her official capacity  
as Vice-Chairman of the State Board of  
Elections; GEORGIA ALVIS-LONG, in her  
official capacity as Secretary of the State Board  
of Elections; DONALD W. MERRICKS and  
MATTHEW WEINSTEIN, in their official  
capacities as members of the State Board of  
Elections; and JASON MIYARES, in his  
official capacity as Virginia Attorney General,

*Defendants.*

Case No. 1:24-cv-01778  
Judge Patricia Tolliver Giles

**PLAINTIFFS' OPPOSED MOTION  
FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Virginia Coalition for Immigrant Rights, African Communities Together, League of Women Voters of Virginia Education Fund, and League of Women Voters of Virginia hereby move for a preliminary injunction seeking the

following relief:

1. An Order Barring Defendants Beals, O'Bannon, Dance, Alvis-Long, Merricks, Weinstein, and Miyares from violating the National Voter Registration Act of 1993 ("NVRA") by purging registered voters within 90 days of an election and subjecting voters to a discriminatory and non-uniform removal system; and

2. An Order providing injunctive relief to remedy Defendants' violations of the NVRA as described in Plaintiffs' Proposed Order.

Plaintiffs' request for such relief relies upon their Memorandum of Law in support of this motion that is filed contemporaneously herewith, along with Plaintiffs' Proposed Order.

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of Virginia, the League of Women Voters of  
Virginia Education Fund, and African  
Communities Together*

*\*Motion for pro hac vice participation  
forthcoming.*

*\*\*Motion for pro hac vice participation  
pending.*

### **CERTIFICATE OF SERVICE**

I certify that on October 15, 2024, I electronically filed the above document with the Clerk of Court using the ECF system, which will provide electronic copies to any counsel of record. Plaintiffs' Counsel will also send courtesy copies to attorneys at the Virginia Attorney General's Office who have met with Plaintiffs' counsel regarding this matter.

/s/ Shanna Ports  
Shanna Ports